

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

W.P.V., on his own behalf and on behalf of
his minor child, W.P.O.,

Plaintiff,

v.

United States of America, Cayuga Home for
Children, Inc. d/b/a Cayuga Centers,

Defendant.

Civil Action No. 1:21-cv-04436-JPC

JURY TRIAL DEMANDED

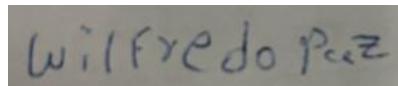
**AFFIRMATION OF WILFREDO PAZ VILLATORO IN SUPPORT OF
MOTION FOR LEAVE TO SETTLE**

The undersigned, Wilfredo Paz Villatoro, being duly sworn:

1. I am over the age of 18 and a resident of the State of Texas. I have a son whose name is W.P.O. and he is nine years old.
2. Plaintiffs' cause of action arises out of the care provided to W.P.V.'s minor child, W.P.O. during his detention at Cayuga Centers.
3. After settlement discussions with Cayuga Center's counsel, in which Cayuga Centers provided discovery concerning W.P.O.'s detention, an agreement was reached to resolve W.P.V. and W.P.O.'s claims against Cayuga Centers for a total amount of [REDACTED] in exchange for a General Release. Ex. 1 (General Release). I approve settlement on these terms.
4. Reimbursement for medical or other expenses has not been received from any source.

5. Separate and apart from the claims that W.P.O. and I have asserted against Cayuga Centers that are being resolved by the General Release, neither I nor any other member of W.P.O.'s family has made a claim against Cayuga Centers for damages alleged to have been suffered as a result of the lack of care provided to W.P.O. during his detention at Cayuga Centers.

Executed this 13th day of January, 2023.

A rectangular box containing a handwritten signature in blue ink. The signature reads "Wilfredo Pez".